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U-003-407 .11

**APPROVAL OF OU 1 FEASIBILITY STUDY/PROPOSED PLAN  
REPORTS**

07/27/94

USEPA	DOE-FM
7	
COMMENTS	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 23 10 44 AM '94

JUL 27 1994

REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Approval of OU-1  
Feasibility Study/Proposed Plan  
Reports

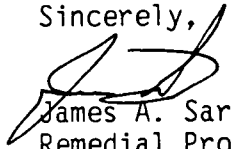
Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) revised Operable Unit (OU) 1 Feasibility Study (FS)/Proposed Plan (PP) reports. The FS/PP reports have adequately addressed the majority of U.S. EPA's comments.

Therefore, U.S. EPA hereby approves the FS/PP Reports pending incorporation of the attached comments. U.S. DOE must incorporate the attached comments and submit change pages to the FS/PP reports within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,

  
James A. Saric  
Remedial Project Manager  
Technical Enforcement Section #1  
RCRA Enforcement Branch

Enclosures

cc: Tom Schneider, OEPA-SWDO  
Pat Whitfield, U.S. DOE-HDQ  
Don Ofte, FERMCO  
Jim Thiesing, FERMCO  
Paul Clay, FERMCO

5787

U-003-407.11

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nonremediation worker and off-site individual would receive the greatest exposure. Appendix D should be revised to locate the nonremediation worker and off-site individual at the points where these receptors would receive the greatest exposure. Table D.3-1 should also be revised to clarify that the receptor distances "assumed" for the nonremediation worker and the off-site worker are based on the results of air modeling.

Commenting Organization: U.S. EPA                      Commentor: Saric  
 Section #: D.7.0                      Page #: D-7-1                      Line #: 20 and 21  
 Original Specific Comment #: 160 (U.S. EPA Comment #37)  
 Comment: The original comment requests that the text be revised to refer correctly to the table or tables containing exposure point concentrations for the residual risk evaluation. In response, U.S. DOE has changed the text to refer to Table D.5-7, which contains air exposure point concentrations. This response is incomplete. The text should be revised to also refer to Tables D.5-6 and D.5-8, which contain surface soil exposure point concentrations and preliminary remediation goals for groundwater, respectively.

Commenting Organization: U.S. EPA                      Commentor: Saric  
 Section #: D.7.0                      Page #: D-7-2                      Line #: 28 and 29  
 Original Specific Comment #: 161 (U.S. EPA Comment #38)  
 Comment: The original comment notes a discrepancy between the text, which states that exposures to volatiles in groundwater were evaluated for the ingestion and dermal contact pathways, and Table/Figure D.3-1, which also includes the inhalation of volatiles as a pathway. U.S. DOE has responded by stating that Table/Figure D.3-1 shows potential pathways and references Table D.3-5 to support the conclusion that inhalation of volatiles from groundwater is not a viable pathway. However, Table D.3-5 includes an inhalation slope factor for tetrachloroethane, a volatile contaminant, which suggests that inhalation of volatiles is a viable pathway. U.S. DOE should clarify whether inhalation of volatiles is a viable pathway and provide justification for this determination.

Commenting Organization: U.S. EPA                      Commentor: Saric  
 Section #: D.7.0                      Page #: NA                      Line #: NA  
 Original Specific Comment #: 174 (U.S. EPA Comment #7)  
 Comment: The original comment requests that the tables in Attachment I be numbered and that the text of Appendix D be revised to include references to these tables. In response, U.S. DOE has numbered the tables and included a single, general reference to Attachment I in Section D.7.0. This response is insufficient. Each summary table in Section D.7.0 should include a footnote that references the specific section and table(s) in Attachment I from which the information was summarized. In addition, the first page of

Attachment I contains a list of the tables contained in the attachment. These tables are identified by number as "D-I-X," where X is the sequential number of the table. The tables themselves are each identified as "D.I-X". The first page of Attachment I should be revised to identify the tables consistently.

TECHNICAL REVIEW COMMENTS ON THE DRAFT FINAL  
OPERABLE UNIT 1 PROPOSED PLAN (REVISION 1)

SPECIFIC COMMENT

Commenting Organization: U.S. EPA                      Commentor: Saric  
Section #: 2.2                      Pg. #: P-2-3                      Line #: NA  
Original Specific Comment #: 187 (U.S. EPA Comment # 1)  
Comment: In response to the original comment, Figure 2-1 was revised to include the location of Harrison. However, in the revised figure, the difference between the Fernald Environmental Management Project site location and the Fernald community is now unclear, and the communities of Shandon and New Baltimore are excluded from the figure. Figure 2-1 should be revised to clarify the Fernald Environmental Management Project site location in relation to the Fernald community, as well as show all communities referenced in the paragraph beginning on Page P-2-2, Line 6, of the draft final proposed plan.

5787

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: July 25, 1994

SUBJECT: Review of the Draft Feasibility Study Report for  
Operable Unit 1, Fernald Environmental Management  
Project (FEMP), Fernald, OH, March 1994

FROM: Pat Van Leeuwen, Toxicologist  
Technical Support Unit

TO: Jim Saric  
Project Manager

I participated in a teleconference with the FERMCO folks, lead by Randy Janke, on Wednesday, July 20, 1994, to discuss the "Response to EPA Comments, Operable Unit 1 Draft Feasibility Study" for the Fernald Environmental Management Project (FEMP), dated 7/14/94. All of the proposed changes are acceptable and the FS report should be ready for approval with their incorporation.

If you have any questions on these comments or any section of the risk assessment, please contact me at 886-4904.

Comment 79 (1) Page 2-20, lines 14-18

Comment 82 (4) Problems with PRG/PRL terminology/  
section 2

All proposed changes indicated under the action for  
comment #79 and #82 are acceptable.

Comment 80 (2) Page 2-21. line 22

All proposed changes indicated under the action for  
this comment are acceptable.

Comment (3) Page 2-21, old line 5

This comment was discussed at the Fernald Operable Unit 1 RI/FS Meeting on June 8, 1994. It was determined the change was due to an initial text error.

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**Comment (5) Page D-4-3, para. 1**

The issue of dermal exposure from contact carcinogens, such as PAHs, was resolved at the June 8, 1994 meeting with FERMCO.

**6) Beryllium**

I have reviewed the IRIS database for beryllium, and can find no evidence that the administered dose was adjusted for absorption in the calculation of the RfD and Cancer Slope Factors. Therefore, I have recommended that the dermal absorption value of 1% provided by ECAO, Cincinnati for beryllium be used, and that the toxicity values for the administered dose be used for the dermal pathways. This should resolve the apparent calculation problem for beryllium.

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